

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-cr-80053-Dimitrouleas/McCabe

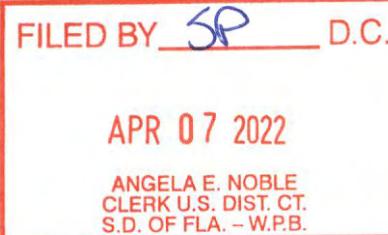
18 U.S.C. § 1201(c)  
18 U.S.C. § 1201(a)(1)  
18 U.S.C. § 1951(a)  
18 U.S.C. § 2119(1)  
18 U.S.C. § 924(c)(1)(A)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(d)(1)  
18 U.S.C. § 981(a)(1)(C)  
18 U.S.C. § 982(a)(5)  
21 U.S.C. § 853

UNITED STATES OF AMERICA

v.

DARWIN AVILA SALGADO,  
a/k/a, "Debo,"  
a/k/a, "drawdown\_bo1,"  
ANTHONY WILLIAM LAMAR,  
a/k/a "Mojo,"  
a/k/a "mojo.set.it.off,"  
and RAHSAAN ROLAND ROBINSON,  
a/k/a "Loso,"  
a/k/a "ggorillachildoso,"

Defendants.



INDICTMENT

The Grand Jury charges that:

COUNT 1  
(Conspiracy to Commit Kidnapping)

In or around December 2020, and continuing through on or about December 14, 2020, the exact date being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**DARWIN AVILA SALGADO,**  
a/k/a, "Debo,"  
a/k/a, "drawdown\_bo1,"  
**ANTHONY WILLIAM LAMAR,**  
a/k/a "Mojo,"  
a/k/a "mojo.set.it.off,"  
and  
**RAHSAAN ROLAND ROBINSON,**  
a/k/a "Loso,"  
a/k/a "ggorillachildloso,"

did knowingly and willfully combine, conspire, confederate, and agree with each other and other persons, known and unknown to the Grand Jury, to knowingly and unlawfully seize, confine, kidnap, abduct, and carry away any person, and hold that person for ransom and reward and otherwise, and travel in interstate commerce, and use any means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of the commission of the offense of kidnapping, in violation of Title 18, United States Code, Section 1201(a)(1).

**Object of the Conspiracy**

It was the purpose and object of the conspiracy for the defendants to intimidate another person and to obtain United States currency to unlawfully enrich themselves and others.

**Overt Acts**

In furtherance of the conspiracy and to achieve the object thereof, at least one of the conspirators committed and caused to be committed, in the Southern District of Florida, and elsewhere, at least one of the following overt acts, among others:

1. On or about December 9, 2020, **DARWIN AVILA SALGADO** and **ANTHONY WILLIAM LAMAR** traveled from Cleveland, Ohio to Fort Lauderdale, Florida aboard Spirit Airlines.

2. On or about December 10, 2020, **RAHSAAN ROLAND ROBINSON** traveled from Oakland, California, to Miami, Florida, aboard Southwest Airlines.

3. On or about December 11, 2020, **DARWIN AVILA SALGADO** purchased a firearm, that is, a Palmetto State Armory, Model PA-15, AR-15 style semiautomatic assault weapon in Florida.

4. On or about December 9, 2020, **DARWIN AVILA SALGADO** directed that another person known to the Grand Jury, rent a residence located in West Palm Beach, Florida, listed on [www.airbnb.com](http://www.airbnb.com), using the internet.

5. On or about December 13, 2020, **DARWIN AVILA SALGADO** directed that another person known to the Grand Jury, extend the rental of a residence located in West Palm Beach, Florida, listed on [www.airbnb.com](http://www.airbnb.com), using the internet.

6. On or about December 14, 2020, **ANTHONY WILLIAM LAMAR** sent an electronic communication to Victim #1 with the address to the Airbnb residence located in West Palm Beach, Florida.

7. On or about December 14, 2020, **DARWIN AVILA SALGADO, ANTHONY WILLIAM LAMAR, and RAHSAAN ROLAND ROBINSON**, physically assaulted Victim #1 and Victim #2 inside the Airbnb residence in West Palm Beach, Florida.

8. On or about December 14, 2020, **DARWIN AVILA SALGADO, ANTHONY WILLIAM LAMAR, and RAHSAAN ROLAND ROBINSON**, restrained Victim #1 and Victim #2 using tape and plastic ties inside the Airbnb residence in West Palm Beach, Florida.

9. On or about December 14, 2020, **DARWIN AVILA SALGADO, ANTHONY WILLIAM LAMAR, and RAHSAAN ROLAND ROBINSON**, placed Victim #1 in the back of Victim #1 motor vehicle while restrained.

10. On or about December 14, 2020, **DARWIN AVILA SALGADO, ANTHONY WILLIAM LAMAR, and RAHSAAN ROLAND ROBINSON**, placed Victim #2 inside the trunk of Victim #1 motor vehicle while restrained.

11. On or about December 14, 2020, **DARWIN AVILA SALGADO, ANTHONY WILLIAM LAMAR, and RAHSAAN ROLAND ROBINSON**, used Victim #1's motor vehicle to transport Victim #1 and Victim #2 from the Airbnb residence in West Palm Beach, Florida, to Belle Glade, Florida.

All in violation of Title 18, United States Code, Section 1201(c).

**COUNT 2**  
**(Kidnapping)**

On or about December 14, 2020, in Palm Beach County, in the Southern District of Florida, the defendants,

**DARWIN AVILA SALGADO,  
a/k/a, "Debo,"  
a/k/a, "drawdown\_bo1,"  
ANTHONY WILLIAM LAMAR,  
a/k/a "Mojo,"  
a/k/a "mojo.set.it.off,"  
and  
RAHSAAN ROLAND ROBINSON,  
a/k/a "Loso,"  
a/k/a "ggorillachildoso,"**

did willfully and unlawfully seize, confine, kidnap, abduct, and carry away a person, that is, Victim #1 and Victim #2, and hold that person for ransom and reward and otherwise, having travelled in interstate commerce, and using any means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of the commission of the offense, in violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

**COUNT 3**  
**(Conspiracy to Commit Hobbs Act Robbery)**

In or around December 9, 2020, and continuing through on or about December 14, 2020, the exact date being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**DARWIN AVILA SALGADO,**  
a/k/a, "Debo,"  
a/k/a, "drawdown\_bo1,"  
**ANTHONY WILLIAM LAMAR,**  
a/k/a "Mojo,"  
a/k/a "mojo.set.it.off,"  
and  
**RAHSAAN ROLAND ROBINSON,**  
a/k/a "Loso,"  
a/k/a "ggorillachildloso,"

did knowingly and willfully combine, conspire, confederate, and agree with each other, and other persons known and unknown to the Grand Jury, to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b)(1) and (b)(3), in that the defendants did unlawfully plan to take property and United States currency from the person and in the presence of an individual believed to be engaged in business of marijuana trafficking, against the will of that individual, and by means of actual and threatened force, violence, and fear of injury to said individual and to others, in violation of Title 18, United States Code, Section 1951(a).

**COUNT 4**  
**(Hobbs Act Robbery)**

On or about December 2020, in the Southern District of Florida, the defendants,

**DARWIN AVILA SALGADO,**  
a/k/a, “Debo,”  
a/k/a, “drawdown\_bo1,”  
**ANTHONY WILLIAM LAMAR,**  
a/k/a “Mojo,”  
a/k/a “mojo.set.it.off,”  
and  
**RAHSAAN ROLAND ROBINSON,**  
a/k/a “Loso,”  
a/k/a “ggorillachildoso,”

did knowingly obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951(b)(1) and (b)(3), in that the defendants did take property and United States currency from the person and in the presence of an individual engaged in the business of marijuana trafficking, against the will of that individual, by means of actual and threatened force, violence, and fear of injury to said individual and to others, in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT 5**  
**(Carjacking)**

On or about December 14, 2020, in Palm Beach County, in the Southern District of Florida, the defendants,

**DARWIN AVILA SALGADO,**  
a/k/a, “Debo,”  
a/k/a, “drawdown\_bo1,”  
**ANTHONY WILLIAM LAMAR,**  
a/k/a “Mojo,”  
a/k/a “mojo.set.it.off,”  
and

**RAHSAAN ROLAND ROBINSON,  
a/k/a "Loso,"  
a/k/a "ggorillachildoso,"**

with intent to cause death and serious bodily harm, did take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, that is, a 2020 Dodge Challenger, from the person and presence of another by force and violence, and by intimidation, in violation of Title 18, United States Code, Sections 2119(1) and 2.

**COUNT 6  
(Use of a Firearm During and in Furtherance of a Crime of Violence)**

On or about December 14, 2020, in Palm Beach County, in the Southern District of Florida, the defendants,

**DARWIN AVILA SALGADO,  
a/k/a, "Debo,"  
a/k/a, "drawdown\_bo1,"  
ANTHONY WILLIAM LAMAR,  
a/k/a "Mojo,"  
a/k/a "mojo.set.it.off,"  
and  
RAHSAAN ROLAND ROBINSON,  
a/k/a "Loso,"  
a/k/a "ggorillachildoso,"**

did knowingly use and carry a firearm during and in relation to a crime of violence, and did knowingly possess a firearm in furtherance of a crime of violence, an offense for which the defendant may be prosecuted in a court of the United States, that is, a violation of Title 18, United States Code, Section 1951(a), as set forth in Count 4 of this Indictment, and a violation of Title 18, United States Code, Section 2119(1), as set forth in Count 5 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

Pursuant to Title 18, United States Code, Section 924(c)(1)(A)(ii), it is further alleged that the firearm was brandished.

Pursuant to Title 18, United States Code, Section 924(c)(1)(B), it is further alleged that the firearm was a semiautomatic assault weapon.

**COUNT 7**  
**(Possession of Firearm by Prohibited Person – Convicted Felon)**

On or about December 14, 2020, in Palm Beach County, in the Southern District of Florida, the defendant,

**ANTHONY WILLIAM LAMAR,  
a/k/a “Mojo,”  
a/k/a “mojo.set.it.off,”**

did knowingly possess a firearm, in and affecting interstate and foreign commerce, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the firearm is one (1) Palmetto State Armory, Model PA-15, multi-caliber semi-automatic assault weapon.

**FORFEITURE ALLEGATIONS**

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, **DARWIN AVILA SALGADO, ANTHONY WILLIAM LAMAR, and RAHSAAN ROLAND ROBINSON**, have an interest.

2. Upon a conviction of a violation, of Title 18, United States Code, Sections 1201 and/or 1951, as alleged in this Indictment, the defendants shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to such offense,

pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. Upon conviction of a violation of Title 18, United States Code, Section 2119, as alleged in this Indictment, the defendants shall forfeit to the United States any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such offense, pursuant to Title 18, United States Code, Section 982(a)(5).

4. Upon conviction of a violation of Title 18, United States Code, Sections 2119, 922 and 924, or any other criminal laws of the United States, as alleged in this Indictment, the defendants shall forfeit to the United States any firearm and ammunition involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924(d)(1).

All pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C), and 982(a)(5), and Title 21, United States Code, Section 853.

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

  
JUAN ANTONIO GONZALEZ

UNITED STATES ATTORNEY

  
ADAM C. McMICHAEL  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**UNITED STATES OF AMERICA**

CASE NO.: 22-cr-80053-Dimitrouleas/McCabe

v.

DARWIN AVILA SALGADO, et al.,

## CERTIFICATE OF TRIAL ATTORNEY\*

### **Superseding Case Information:**

**Court Division (select one)**

Miami     Key West     FTP  
 FTL     WPB

New Defendant(s) (Yes or No)

### Number of New Defendants

### Total number of New Counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) **No**  
List language and/or dialect:
4. This case will take **10** days for the parties to try.
5. Please check appropriate category and type of offense listed below:  
(Check only one) (Check only one)  
I  0 to 5 days  Petty  
II  6 to 10 days  Minor  
III  11 to 20 days  Misdemeanor  
IV  21 to 60 days  Felony  
V  61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) **No**  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) **Yes**  
If yes, Magistrate Case No. **22-8071-BER**
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) **No**  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of **3/8/2022**
10. Defendant(s) in state custody as of **3/6/2022**
11. Rule 20 from the \_\_\_\_\_ District of **Nevada**
12. Is this a potential death penalty case? (Yes or No) **No**
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? (Yes or No) **No**
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) **No**

By:

Adam C. McMichael

Adam C. McMichael  
Assistant United States Attorney  
FLA Bar No. 0772321

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDAPENALTY SHEETCASE NO. 22-cr-80053-Dimitrouleas/McCabeDefendant's Name: DARWIN AVILA SALGADO

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to Commit Kidnapping	18 U.S.C. § 1201(c)	Life imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment
2	Kidnapping	18 U.S.C. § 1201(a)(1)	Life imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment
3, 4	Conspiracy to Commit Hobbs Act Robbery and Substantive Hobbs Act Robbery	18 U.S.C. § 1951(a)	20 years' imprisonment \$250,000 fine 3 years' supervised release \$100 special assessment
5	Carjacking	18 U.S.C. § 2119(1)	15 years' imprisonment \$250,000 fine 3 years' supervised release \$100 special assessment
6	Brandishing a Semiautomatic Assault Weapon During and in Furtherance of a Crime of Violence.	18 U.S.C. §§ 924(c)(1)(A)(ii) & (B)(i)	10 years to life imprisonment, to be served consecutive to any other sentence of imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDAPENALTY SHEETCASE NO. 22-cr-80053-Dimitrouleas/McCabeDefendant's Name: ANTHONY WILLIAM LAMAR

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to Commit Kidnapping	18 U.S.C. § 1201(c)	Life imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment
2	Kidnapping	18 U.S.C. § 1201(a)(1)	Life imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment
3, 4	Conspiracy to Commit Hobbs Act Robbery and Substantive Hobbs Act Robbery	18 U.S.C. § 1951(a)	20 years' imprisonment \$250,000 fine 3 years' supervised release \$100 special assessment
5	Carjacking	18 U.S.C. § 2119(1)	15 years' imprisonment \$250,000 fine 3 years' supervised release \$100 special assessment
6	Brandishing a Semiautomatic Assault Weapon During and in Furtherance of a Crime of Violence.	18 U.S.C. §§ 924(c)(1)(A)(ii) & (B)(i)	10 years to life imprisonment, to be served consecutive to any other sentence of imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment
7	Possession of a Firearm by a Prohibited Person – Convicted Felon	18 U.S.C. § 922(g)(1)	10 years' imprisonment \$250,000 fine 3 years' supervised release \$100

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDAPENALTY SHEETCASE NO. 22-cr-80053-Dimitrouleas/McCabeDefendant's Name: RAHSAAN ROLAND ROBINSON

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
1	Conspiracy to Commit Kidnapping	18 U.S.C. § 1201(c)	Life imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment
2	Kidnapping	18 U.S.C. § 1201(a)(1)	Life imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment
3, 4	Conspiracy to Commit Hobbs Act Robbery and Substantive Hobbs Act Robbery	18 U.S.C. § 1951(a)	20 years' imprisonment \$250,000 fine 3 years' supervised release \$100 special assessment
5	Carjacking	18 U.S.C. § 2119(1)	15 years' imprisonment \$250,000 fine 3 years' supervised release \$100 special assessment
6	Brandishing a Semiautomatic Assault Weapon During and in Furtherance of a Crime of Violence.	18 U.S.C. §§ 924(c)(1)(A)(ii) & (B)(i)	10 years to life imprisonment, to be served consecutive to any other sentence of imprisonment \$250,000 fine 5 years' supervised release \$100 special assessment